FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Meilink Safe Company
111 Security Parkway
New Albany, Indiana 47150

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F043-11524-00043	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Certification Form
Emergency/Deviation Form
Quarterly Report Forms
Quarterly Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary commercial storage safe manufacturing operation.

Authorized individual:	Van Carlisle
Source Address:	111 Security Parkway, New Albany, Indiana 47150
Mailing Address:	111 Security Parkway, New Albany, Indiana 47150
Phone Number:	812-948-8400
SIC Code:	2522
County Location:	Floyd
County Status:	Moderate Nonattainment for Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of three (3) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;

(b) one (1) primer paint spray booth, identified as EU-14, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 14;

(c) one (1) finish paint spray booth, identified as EU-16, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 16; and

(d) one (1) primer drying room.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  (1) two (2) natural gas-fired furnaces, identified as EU-1 and EU-2, each with a maximum heat input capacity of 0.1 million British thermal units (MMBtu) per hour, exhausting to the atmosphere;

(2) two (2) natural gas-fired water heaters, identified as EU-3 and EU-13, each with a maximum heat input capacity of 0.032 MMBtu per hour, exhausting to the atmosphere;
(3) two (2) natural gas-fired radiant space heaters, identified as EU-4 and EU-5, each with a maximum heat input capacity of 0.6 MMBtu per hour, exhausting to one (1) stack, S/V 7;
(4) one (1) natural gas-fired curing room heater, identified as EU-7, with a maximum heat input capacity of 0.092 MMBtu per hour, exhausting to one (1) stack, S/V 7;
(5) one (1) natural gas-fired radiant space heater, identified as EU-12, with a maximum heat input capacity of 0.4 MMBtu per hour, exhausting to one (1) stack, S/V 7;
(6) one (1) natural gas-fired make up air unit, identified as EU-11, with a maximum heat input capacity of 5.3 MMBtu per hour, exhausting to the atmosphere;
(7) one (1) natural gas-fired phosphate wash heater, identified as EU-19, with a maximum heat input capacity of 0.55 MMBtu per hour, exhausting to one (1) stack, S/V 19.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (This is a small Safety Kleen parts washer used for maintenance purposes, using no more than 40 gallons per year.)

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(d) Infrared cure equipment.

(e) Paved and unpaved roads and parking lots with public access.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. At this source, this includes the following:
(1) one (1) primer sanding area, identified as EU-15, consisting of nine (9) sanding work stations, identified as EU-15 A through I, processing a maximum of eight (8) metal safes per hour, with all emissions captured and ducted to a 3,900 cubic feet per minute (cfm), hog-type dust collector, which filters and returns the air to the work area.

(h) Other categories with emissions below insignificant thresholds:
(1) one (1) powder coat line, identified as EU-17, coating a maximum of 1,500 pounds of metal safe parts per hour, with all emissions captured by a 5,000 cfm circulating draw and sent to waste, with no exhaust inside or outside the building;
(2) one (1) aerosol can spraying cosmetic paint touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation; and

(3) one (1) covered dip tank used for rust preventative application.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the

certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(b) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.15 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of three (3) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;

(b) one (1) primer paint spray booth, identified as EU-14, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 14;

(c) one (1) finish paint spray booth, identified as EU-16, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 16; and

(d) one (1) primer drying room.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in each of the five (5) paint spray booths shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.

(b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The total usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to 96.07 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the source wide potential to emit of VOC to less than 100 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

(b) The total usage of any combination of HAP, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with these limits makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the five (5) paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The following calculations will show compliance with 326 IAC 8-2-9 using the volume weighted average method pursuant to 326 IAC 8-1-2(a)(7). The average VOC in pound per gallon of coating that will be emitted from the usage of the coatings in the five (5) spray booths is determined as follows:

$$\text{Average VOC in pound per gallon of coating} = \sum (\text{lb VOC/gal of coating less water for each coating}) \times \frac{\text{(usage of each coating in gal/unit)}}{\text{total volume of all coatings in gal/unit}}$$

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the five (5) paint spray booths are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V 8, S/V 9, S/V 10, S/V 14, and S/V 16) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activity

one (1) aerosol can spraying touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Input volatile organic compounds (VOC) used in the aerosol can spraying touch up operation is less than or equal to 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply. Any change or modification that would increase the actual VOC emissions from the touch up operation to greater than 15 pounds per day shall require approval from the Office of Air Management (OAM), as required by 326 IAC 2-1, before such change can occur.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.

(1) The amount VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each day;

(4) The total VOC usage for each day; and

(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(c) one (1) primer paint spray booth, identified as EU-14, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 14;

(d) one (1) finish paint spray booth, identified as EU-16, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 16; and

(e) one (1) primer drying room.

The following Insignificant Activities:

(g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. At this source, this includes the following:

(1) one (1) primer sanding area, identified as EU-15, consisting of nine (9) sanding work stations, identified as EU-15 A through I, processing a maximum of eight (8) metal safes per hour, with all emissions captured and ducted to a 3,900 cubic feet per minute (cfm), hog-type dust collector, which filters and returns the air to the work area.

(h) Other categories with emissions below insignificant thresholds:

(1) one (1) powder coat line, identified as EU-17, coating a maximum of 1,500 pounds of metal safe parts per hour, with all emissions captured by a 5,000 cfm circulating draw and sent to waste, with no exhaust inside or outside the building; and

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.3.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

See Sections D.1 and D.2 above for Operation Conditions

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Meilink Safe Company
Source Address: 111 Security Parkway, New Albany, Indiana 47150
Mailing Address: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: F043-11524-00043

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Meilink Safe Company
Source Address: 111 Security Parkway, New Albany, Indiana 47150
Mailing Address: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: F043-11524-00043

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) ℂThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ℂThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) ℂThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Meilink Safe Company
Source Address: 111 Security Parkway, New Albany, Indiana 47150
Mailing Address: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: F043-11524-00043
Facility: Five (5) paint spray booths
Parameter: VOC Usage
Limit: The total usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to 96.07 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Meilink Safe Company
Source Address: 111 Security Parkway, New Albany, Indiana 47150
Mailing Address: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: F043-11524-00043
Facility: Five (5) paint spray booths
Parameter: Total HAP usage
Limit: The total usage of any combination of HAP, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total HAP Usage This Month (tons)	Total HAP Usage Previous 11 Months (tons)	12 Month Total HAP Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Meilink Safe Company
Source Address: 111 Security Parkway, New Albany, Indiana 47150
Mailing Address: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: F043-11524-00043

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: **Meilink Safe Company**
Source Location: **111 Security Parkway, New Albany, Indiana 47150**
County: **Floyd**
SIC Code: **2522**
Operation Permit No.: **F043-11524-00043**
Permit Reviewer: **Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a FESOP application from Meilink Safe Company relating to the operation of a commercial storage safe manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of three (3) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;

Note: Two (2) paint spray booths, identified as EU-15 and EU-17, and three (3) natural gas-fired drying ovens, identified as EU-14, EU-16, and EU-18, which were included in the previous construction permit (CP-043-6546-00043), were never constructed at this source and the permittee will not be installing them. Therefore, they are not included in this permit.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) one (1) primer paint spray booth, identified as EU-14, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 14;

(b) one (1) finish paint spray booth, identified as EU-16, using a high volume low pressure (HVLP) spray application system, coating a maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through one (1) stack, identified as S/V 16; and

(c) one (1) primer drying room.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  (1) two (2) natural gas-fired furnaces, identified as EU-1 and EU-2, each with a maximum heat input capacity of 0.1 million British thermal units (MMBtu) per hour, exhausting to the atmosphere;
  (2) two (2) natural gas-fired water heaters, identified as EU-3 and EU-13, each with a maximum heat input capacity of 0.032 MMBtu per hour, exhausting to the atmosphere;
  (3) two (2) natural gas-fired radiant space heaters, identified as EU-4 and EU-5, each with a maximum heat input capacity of 0.6 MMBtu per hour, exhausting to one (1) stack, S/V 7;
  (4) one (1) natural gas-fired curing room heater, identified as EU-7, with a maximum heat input capacity of 0.092 MMBtu per hour, exhausting to one (1) stack, S/V 7;
  (5) one (1) natural gas-fired radiant space heater, identified as EU-12, with a maximum heat input capacity of 0.4 MMBtu per hour, exhausting to one (1) stack, S/V 7;
  (6) one (1) natural gas-fired make up air unit, identified as EU-11, with a maximum heat input capacity of 5.3 MMBtu per hour, exhausting to the atmosphere;
  (7) one (1) natural gas-fired phosphate wash heater, identified as EU-19, with a maximum heat input capacity of 0.55 MMBtu per hour, exhausting to one (1) stack, S/V 19.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (This is a small Safety Kleen parts washer used for maintenance purposes, using no more than 40 gallons per year.)

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(d) Infrared cure equipment.

(e) Paved and unpaved roads and parking lots with public access.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. At this source, this includes the following:
  (1) one (1) primer sanding area, identified as EU-15, consisting of nine (9) sanding work stations, identified as EU-15 A through I, processing a maximum of eight (8) metal safes per hour, with all emissions captured and ducted to a 3,900 cubic feet per minute (cfm), hog-type dust collector, which filters and returns the air to the

work area.

Note: All emissions generated in the primer sanding area (EU-15) are captured sent to a dust collector where the air is filtered and re-circulated to the work area. There is no exterior exhaust, therefore, there are no emissions to the atmosphere from this emission unit.

(h) Other categories with emissions below insignificant thresholds:
(1) one (1) powder coat line, identified as EU-17, coating a maximum of 1,500 pounds of metal safe parts per hour, with all emissions captured by a 5,000 cfm circulating draw and sent to waste, with no exhaust inside or outside the building;
(2) one (1) aerosol can spraying cosmetic paint touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation; and
(3) one (1) covered dip tank used for rust preventative application.

Note: The powder coat line (EU-17) must meet OSHA standards when operating and will therefore operate with a vacuum type collection system which collects all excess powder and deposits it into sealed drums for disposal. There is no exhaust inside or outside of the building, therefore, there are no emissions to the atmosphere from this emission unit.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 043-6546-00043, issued on June 2, 1997.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete FESOP application for the purposes of this review was received on November 3, 1999. Additional information received on December 22, 1999, makes the FESOP application administratively complete.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	84.62
PM-10	84.82
SO_2	0.02
VOC	113.22
CO	2.87
NO_x	3.42

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethylbenzene	less than 10
Ethylene Glycol	less than 10
Hexamethylene-1,6-diisocyanate	less than 10
Methyl Isobutyl Ketone	less than 10
Toluene	less than 10
Toluene Diisocyanate	less than 10
Xylenes	less than 10
Chromium Compounds	less than 10
Glycol Ethers	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	5.55
CO	0.0
NO_x	0.0
HAP (specify)	N/A

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	HAPs
Spray Booths (EU8, EU9, EU10, EU14 and EU16)	84.56	84.56	0.0	96.07	0.0	0.0	9.84	24.0
Natural gas combustion*	0.06	0.26	0.02	0.19	2.87	3.42	0.0	0.0
Aerosol Touch Up*	0.0	0.0	0.0	2.74	0.0	0.0	0.0	0.0
Total Emissions	84.62	84.82	0.02	99.0	2.87	3.42	9.84	24.0

* Natural gas combustion and the aerosol touch up operation are Insignificant Activities.

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	moderate nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as moderate nonattainment for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part

60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Floyd County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the total usage of VOC in the five (5) spray booths (EU-8, EU-9, EU-10, EU-14, and EU-16) shall be limited to 96.07 tons per twelve (12) consecutive month period, rolled on a monthly basis such that source wide VOC emissions are limited to less than 100 tons per year. The total usage of any combination of HAPs in the five (5) spray booths (EU-8, EU-9, EU-10, EU-14, and EU-16) shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit source wide total HAP emissions to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) The PM emissions from the five (5) spray booths (EU-8, EU-9, EU-10, EU-14, and EU-16) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The dry filters shall be in operation at all times the five (5) spray booths are in operation, in order to comply with this limit.

(b) The total particulate matter (PM) emissions from the nine (9) sanding work stations (EU 15 A through I) shall be limited to 10.7 pounds per hour based on a process weight rate of 8,376 pounds per hour and the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The hog-type dust collector shall be in operation at all times the nine (9) sanding work stations are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions of equal to or greater than 25 tons per year, and not subject to any other requirements of 326 IAC 8. Since the five (5) spray booths are all subject to the requirements of 326 IAC 8-2-9, they are not subject to the requirements of this rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The three (3) spray booths (EU8, EU9, and EU10), which make up one (1) facility, were constructed in 1997, and have actual VOC emissions of greater than 15 pounds per day. The two (2) new spray booths (EU14 and EU16) each have actual VOC emissions of greater than 15 pounds per day. Therefore, all five (5) spray booths, which coat metal safes, are subject to the requirements of this rule. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators in each of the five (5) spray booths, in which air dried coatings or extreme performance coatings are used, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, all the spray booths are in compliance with this requirement.

The following calculations will show compliance with 326 IAC 8-2-9. The volume weighted average method is used to calculate the average VOC in pound per gallon of coating that will be emitted from the usage of the coatings in the five (5) spray booths.

VOC limit = 3.5 pound of VOC per gallon of coating less water for air dried or extreme performance coatings.

Average VOC in pound per gallon of coating $= \sum$ (lb VOC/gal of coating less water for each coating) x $\frac{\text{(usage of each coating in gal/unit)}}{\text{total volume of all coatings in gal/unit}}$

Average VOC in pound per gallon coating less water (VF/F) $= (V_1xF_1 + V_2xF_2 + V_3xF_3 ..... + V_7xF_7) / F$

Where $F = F1 + F2 + F3 .... + F7$

$V_1xF_1 = \frac{\text{Density (lb/gal) x Wt. \% volatiles - Wt. \% water) x (gal/unit)}}{\text{(1 - weight \% water) x (density of coating) / (density of water)}}$

See next page for calculations.

Coating	Booth ID	Density (lb/gal)	F Volume of each coating (gal/unit)	Wt. % volatile	Wt. % water	(1-Wt. % water) x [(coating density)/(water density)]	VF
Polane T Plus	EU-8 - EU-10	11.36	0.500	35.41	0.0	1.361	1.478
Polane Primer	EU-8 - EU-10	8.67	0.375	6.40	81.40	0.193	1.078
Polane HS	EU-8 - EU-10	10.21	0.500	33.69	0.0	1.223	1.406
P-720 Primer	EU-14	11.13	0.500	12.10	0.0	1.334	0.505
Polane Primer	EU-14	8.67	0.500	6.40	81.40	0.193	1.438
UHS 900	EU-16	8.32	0.500	32.60	0.0	0.997	1.360
Polane HS	EU-16	10.21	0.500	33.69	0.0	1.223	1.406
TOTAL			3.375				8.671

Therefore, VF/F = 8.671 / 3.375 = 2.57 pound of VOC per gallon of coating less water and the spray booths are in compliance with 326 IAC 8-2-9.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This rule does not apply to this source. For a source located in Floyd County, this rule applies to those sources that emit or have the potential to emit equal to or greater than 100 tons per year of VOC or those sources that have coating facilities which emit or have the potential to emit equal to or greater than ten (10) tons per year of VOC. The three (3) spray booths (EU8, EU9, and EU10), which make up one (1) facility, have actual VOC emissions of greater than 15 pounds per day and the two (2) new spray booths (EU14 and EU16) each have actual VOC emissions of greater than 15 pounds per day. This is greater than the applicability levels of 326 IAC 8-2. These coating facilities also belong to the miscellaneous metal coating operations source category under 326 IAC 8-2. Therefore, pursuant to 326 IAC 8-7-2(a)(1) and (3), the emissions from these coating facilities would not be included in determining if the applicability thresholds for this rule are exceeded. Since potential VOC emissions from all other facilities at this source are less than 10 tons per year, this source is not subject to the requirements of this rule.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill

the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The five (5) spray booths have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V 8, S/V 9, S/V 10, S/V 14, and S/V 16) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

   These monitoring conditions are necessary because the dry filters for the five (5) spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3 of 4)

Conclusion

The operation of this commercial storage safe manufacturing operation shall be subject to the conditions of the attached proposed **(FESOP No.: F043-11524-00043).**

Appendix A: Emission Calculations Summary

Company Name: Meilink Safe Company
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: 043-11524
Plt ID: 043-00043
Reviewer: Trish Earls/EVP
Date: November 3, 1999

Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	Aerosol Can Touch Up	**TOTAL**
PM	84.56	0.06	0.00	84.62
PM10	84.56	0.26	0.00	84.82
SO2	0.00	0.02	0.00	0.02
NOx	0.00	3.42	0.00	3.42
VOC	110.29	0.19	2.74	113.22
CO	0.00	2.87	0.00	2.87
total HAPs	33.99	negl.	0.00	33.99
worst case single HAP	9.84	negl.	0.00	9.84

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	Aerosol Can Touch Up	**TOTAL**
PM	1.79	0.06	0.00	1.85
PM10	1.79	0.26	0.00	2.05
SO2	0.00	0.02	0.00	0.02
NOx	0.00	3.42	0.00	3.42
VOC	77.87	0.19	2.74	80.80
CO	0.00	2.87	0.00	2.87
total HAPs	24.00	negl.	0.00	24.00
worst case single HAP	6.95	negl.	0.00	6.95

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Meilink Safe Company
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: 043-11524
Plt ID: 043-00043
Reviewer: Trish Earls/EVP
Date: November 3, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer Booths (EU8, EU9, EU10)																
Polane T Plus	11.36	35.41%	0.0%	35.4%	0.0%	51.73%	0.5000	3.000	4.02	4.02	6.03	144.81	26.43	12.05	7.78	75%
Polane Primer	8.67	87.80%	81.4%	6.4%	0.0%	8.58%	0.3750	3.000	0.55	0.55	0.62	14.98	2.73	1.30	6.47	75%
Polane HS	10.21	33.69%	0.0%	33.7%	0.0%	50.58%	0.5000	3.000	3.44	3.44	5.16	123.83	22.60	11.12	6.80	75%
Primer Booth (EU14)																
P-720 Primer	11.13	12.10%	0.0%	12.1%	0.0%	17.50%	0.5000	8.000	1.35	1.35	5.39	129.29	23.59	42.85	7.70	75%
Polane Primer	8.67	87.80%	81.4%	6.4%	0.0%	8.58%	0.5000	8.000	0.55	0.55	2.22	53.27	9.72	4.63	6.47	75%
Finish Booth (EU16)																
UHS 900	8.32	32.60%	0.0%	32.6%	0.0%	38.00%	0.5000	8.000	2.71	2.71	10.85	260.38	47.52	24.56	7.14	75%
Polane HS	10.21	33.69%	0.0%	33.7%	0.0%	50.58%	0.5000	8.000	3.44	3.44	13.76	330.22	60.26	29.65	6.80	75%
								State Potential Emissions:			**25.18**	**604.31**	**110.29**	**84.56**		

Federal Potential Emissions (controlled):

Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
70.61%	0.00%	97.00%	**17.78**	**426.71**	**77.87**	**1.79**

Note: At a 70.61% annual material usage limitation, total HAP emissions are limited to less than 25 tons/yr and VOC emissions are limited to less than 100 tons/yr, therefore, the requirements of 326 IAC 2-7 do not apply.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Meilink Safe Company
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
FESOP No.: 043-11524
Plt ID: 043-00043
Reviewer: Trish Earls/EVP
Date: November 3, 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Hexamethylene Diisocyanate	Weight % MIBK	Weight % Ethylene Glycol	Weight % Chromium	Weight % Toluene	Weight % TDI	Weight % Glycol Ethers
Primer Booths (EU8, EU9, and EU10)												
Polane T Plus	11.36	0.5000	3.000	3.94%	0.56%	0.04%	1.55%	2.25%	0.00%	0.00%	0.00%	0.14%
Polane Primer	8.67	0.3750	3.000	0.00%	0.00%	0.00%	0.00%	2.91%	0.15%	0.00%	0.00%	0.00%
Polane HS	10.21	0.5000	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.16%	0.00%
Primer Booth (EU14)												
P-720 Primer	11.13	0.5000	8.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Polane Primer	8.67	0.5000	8.000	0.00%	0.00%	0.00%	0.00%	2.91%	0.15%	0.00%	0.00%	0.00%
Finish Booth (EU16)												
UHS 900	8.32	0.5000	8.000	4.00%	0.00%	0.00%	4.73%	0.00%	0.00%	0.00%	0.00%	0.00%
Polane HS	10.21	0.5000	8.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.16%	0.00%

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Hexamethylene Diisocyanate Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Chromium Emissions (ton/yr)	Toluene Emissions (ton/yr)	TDI Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Primer Booths (EU8, EU9, and EU10)												
Polane T Plus	11.36	0.5000	3.000	2.94	0.42	0.03	1.16	1.68	0.00	0.00	0.00	0.10
Polane Primer	8.67	0.3750	3.000	0.00	0.00	0.00	0.00	1.24	0.06	0.00	0.00	0.00
Polane HS	10.21	0.5000	3.000	0.00	0.00	0.00	0.00	0.00	0.00	2.68	0.11	0.00
Primer Booth (EU14)												
P-720 Primer	11.13	0.5000	8.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Polane Primer	8.67	0.5000	8.000	0.00	0.00	0.00	0.00	4.42	0.22	0.00	0.00	0.00
Finish Booth (EU16)												
UHS 900	8.32	0.5000	8.000	5.83	0.00	0.00	6.89	0.00	0.00	0.00	0.00	0.00
Polane HS	10.21	0.5000	8.000	0.00	0.00	0.00	0.00	0.00	0.00	7.16	0.29	0.00
				8.77	**0.42**	**0.03**	**8.05**	**6.10**	**0.28**	**9.84**	**0.39**	**0.10**

Total State Potential Emissions

Total HAPs: **33.99**

Material Usage Limitation: **70.61%**

6.19	**0.30**	**0.02**	**5.69**	**4.31**	**0.20**	**6.95**	**0.28**	**0.07**

Total Federal Potential Emissions

Total HAPs: **24.00**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Limited HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Meilink Safe Company**
Address City IN Zip: **111 Security Parkway, New Albany, Indiana 47150**
FESOP No.: **043-11524**
Plt ID: **043-00043**
Reviewer: **Trish Earls/EVP**
Date: **November 3, 1999**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.8	68.4

Heat Input Capacity includes: two (2) furnaces (EU1 and EU2), each rated at 0.1 MMBtu/hr; two (2) water heaters (EU3 and EU13), each rated at 0.032 MMBtu/hr; one make up air unit (EU11), rated at 5.3 MMBtu/hr; three (3) radiant space heaters and one (1) curing room heater (EU4, EU5, EU12, and EU7), with a total heat input capacity of 1.692 MMBtu/hr; and one (1) phosphate wash heater (EU19), rated at 0.55 MMBtu/hr.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.26	0.02	3.42	0.19	2.87

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton